

**REMARKS**

**Amended Claims**

Claims 1-11, 14-15 and 21 are amended herein.

**Claim Rejections Under 35 U.S.C. § 102**

Claims 11-13, 15-16 and 19-22 were rejected under 35 U.S.C. § 102(e) as being anticipated by Schlonski et al.(U.S. Publication No. US 2002/0196451 A1). Applicant respectfully traverses this rejection. Applicant reserves the right to swear behind the reference Schlonski et al., but submits that claims 11-13, 15-16, 19-22, as amended, are allowable for the following reasons.

Applicant respectfully maintains that the system disclosed in Schlonski et al. the Administrator directly utilizes a management program on a workstation (the “imaging device” of the Examiner’s rejection). Thus, Applicant respectfully maintains that the management program of Schlonski et al. is not disclosed as being resident on the imaging device being configured, such that the Administrator is required to “surf” across a network with a browser to utilize the management program through the imaging device’s embedded webserver. In addition, Applicant maintains that in Schlonski et al. the workstation (“imaging device”) displaying the list of other imaging devices is also not disclosed as being configured itself by the management facility. *See*, Schlonski et al., Abstract; Figures 2-5; Paragraph 0027, Page 3; Paragraph 0030, Page 3; Paragraph 0032, Page 3; and Paragraph 0035, Page 3.

Applicant therefore respectfully submits that Schlonski et al. fails to teach or disclose a system that communicates a configuration change across a network to a management facility that is accessible through a network interface and an embedded webserver of a first imaging device, selects at least one other imaging device from a list of other imaging devices stored on the first imaging device and communicates the configuration change from the imaging device to the at least one other imaging device selected from the list of other imaging devices stored on the first imaging device. As such, Schlonski et al. fails to teach or disclose all elements of claims 11-13, 15-16, 19-22, as amended.

Applicant’s claim 11, as amended, recites “[a] method of configuring a plurality of imaging devices coupled to a network, the method comprising: communicating a

configuration change across a network to a management facility that is accessible through a network interface and an embedded webserver of a first imaging device; selecting at least one other imaging device from a list of other imaging devices stored on the first imaging device by communicating across the network to the management facility of the first imaging device across the network; and communicating the configuration change from the first imaging device to the at least one other imaging device selected from the list of other imaging devices stored on the first imaging device.” As detailed above, Applicant submits that Schlonski et al. fails to teach or disclose such a method of configuring a plurality of imaging devices coupled to a network. As such, Schlonski et al. fails to teach or disclose all elements of independent claim 11.

Applicant’s claim 15, as amended, recites “[a] method of operating a plurality of imaging devices, the method comprising: communicating a configuration change by surfing across a network with a web browser to a management facility accessible through an embedded webserver of a first imaging device; processing the configuration change on the first imaging device, thereby generating a configuration on the first imaging device; and configuring one or more other imaging devices from the management facility of the first imaging device in response to the configuration change of the first imaging device, wherein the one or more other imaging devices are selected from a list stored on the first imaging device.” As detailed above, Applicant submits that Schlonski et al. fails to teach or disclose such a method of operating a plurality of imaging devices. As such, Schlonski et al. fails to teach or disclose all elements of independent claim 15.

Applicant’s claim 21, as amended, recites “[a] computer-usable medium having computer readable instructions stored thereon for execution by a processor to perform a method comprising: processing a configuration change on a first imaging device, wherein the configuration change is received across a network via a management facility accessible through an embedded webserver of the first imaging device; referring to a list of other imaging devices on the network stored in the first imaging device; and configuring at least one imaging device selected from the list via the management facility of the first imaging device in response to the configuration change of the first imaging device.” As detailed above, Applicant submits that Schlonski et al. fails to teach or disclose such a computer-usable medium and method. As such, Schlonski et al. fails to teach or disclose all elements of independent claim 21.

Applicant respectfully contends that claims 11, 15 and 21 as pending have been

shown to be patentably distinct from the cited reference. As claims 12-13, 16, 19-20, and 22 depend from and further define claims 11, 15 and 21, respectively, they are also considered to be in condition for allowance. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection under 35 U.S.C. § 102(e) and allowance of claims 11-13, 15-16, 19-22.

*Claim Rejections Under 35 U.S.C. § 103*

Claims 1-4 and 8 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Schlonski et al.(U.S. Publication No. US 2002/0196451 A1) in view of Carcerano et al. (U.S. Patent No. 6,308,205 B1). Applicant respectfully traverses this rejection and submits that claims 1-4 and 8 are allowable for the following reasons.

Applicant respectfully maintains, as above, that, in the system disclosed in Schlonski et al., the Administrator directly utilizes a management program on a workstation (the “imaging device” of the Examiner’s rejection) and that therefore the management program of Schlonski et al. is not disclosed as being resident on the imaging device being configured, such that the Administrator is required to “surf” across a network with a browser to utilize the management program through the imaging device’s embedded webserver. In addition, Applicant also maintains, as above, that in Schlonski et al. the workstation (“imaging device”) displaying the list of other imaging devices is also not disclosed as being configured itself by the management facility.

Applicant therefore respectfully submits that Schlonski et al. fails to teach or suggest an imaging device adapted to store a configuration for the imaging device on a computer-usable media, where the configuration is input by commands received across a network by a management facility on the imaging device that is accessible through an embedded webserver, wherein the imaging device is adapted to store a list of other imaging devices on the network on the computer-usable media, and wherein the imaging device is adapted to transmit the configuration to a network address of at least one of the other imaging devices of the stored list. As such, Applicant therefore maintains that Schlonski et al. fails to teach or suggest all elements of claim 1.

In addition, Applicant respectfully maintains that, in the system disclosed in Carcerano et al., the Administrator utilizes a management program on a server and that therefore the management program of Carcerano et al. is not disclosed as being resident on

the imaging device being configured, such that the Administrator is required to “surf” across a network with a browser to utilize the management program through the imaging device’s embedded webserver. Applicant therefore respectfully submits that Carcerano et al. also fails to teach or suggest an imaging device adapted to store a configuration for the imaging device on a computer-usable media, where the configuration is input by commands received across a network by a management facility on the imaging device that is accessible through an embedded webserver, wherein the imaging device is adapted to store a list of other imaging devices on the network on the computer-usable media, and wherein the imaging device is adapted to transmit the configuration to a network address of at least one of the other imaging devices of the stored list. *See*, Carcerano et al., Abstract; Figures 5 and 8A; Column 1, line 53 to Column 2, line 61. Therefore combining the elements of Schlonski et al. with Carcerano et al. fails to teach or suggest all elements of claims 1-4 and 8.

Applicant’s claim 1, as amended, recites, “[a]n imaging device, comprising: a processor adapted for communication with a network using an embedded webserver; and a computer-usable media coupled to the processor; wherein the processor is adapted to store a configuration for the imaging device on the computer-usable media, where the configuration is input by commands received across the network by a management facility on the imaging device that is accessible through the embedded webserver; wherein the processor is adapted to store a list of other imaging devices on the network on the computer-usable media; and wherein the processor is adapted to transmit the configuration to a network address of at least one of the other imaging devices of the stored list.” As detailed above, Applicant submits that Schlonski et al. and Carcerano et al. fail to teach or suggest such an imaging device, either alone or in combination. As such, Schlonski et al. and Carcerano et al. fail to teach or suggest all elements of independent claim 1.

Applicant respectfully contends that claim 1 as pending has been shown to be patentably distinct from the cited references, either alone or in combination. As claims 2-4 and 8 depend from and further define claim 1 they are also considered to be in condition for allowance. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection under 35 U.S.C. § 103(a) and allowance of claims 1-4 and 8.

Claim 7 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Schlonski et al. (U.S. Publication No. US 2002/0196451 A1) in view of Carcerano et al. (U.S. Patent No. 6,308,205 B1) and further in view of Mathieson (U.S. Publication No. US 2002/0143915

A1). Applicant respectfully traverses this rejection and submits that claim 7 is allowable for the following reasons.

Applicant respectfully maintains, as stated above, that Schlonski et al. and Carcerano et al. fail to teach or suggest all elements of claim 1, from which claim 7 depends from. In addition, Applicant respectfully maintains that Mathieson discloses a print queue manager that allows a user or administrator to view and manage the jobs in multiple job queues at the same time. *See*, Mathieson, Abstract and Summary. Applicant therefore respectfully submits that combining the elements of Schlonski et al. and Carcerano et al. with Mathieson. fails to teach or suggest all elements of independent claim 1 and thus also fails to teach or suggest all elements of dependent claim 7, either alone or in combination.

Applicant respectfully contends that claim 1 as pending has been shown to be patentably distinct from the cited references, either alone or in combination. As claim 7 depends from and further defines claim 1 it is also considered to be in condition for allowance. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection under 35 U.S.C. § 103(a) and allowance of claim 7.

Claims 5-6 and 9-10 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Schlonski et al.(U.S. Publication No. US 2002/0196451 A1) in view of Carcerano et al. (U.S. Patent No. 6,308,205 B1) and further in view of Hawes (U.S. Patent No. 6,026,436). Applicant respectfully traverses this rejection and submits that claims 5-6 and 9-10 are allowable for the following reasons.

Applicant respectfully maintains, as stated above, that Schlonski et al. and Carcerano et al. fail to teach or suggest all elements of claim 1, from which claims 5-6 and 9-10 depend from. In addition, Applicant respectfully maintains that Hawes discloses a system where a configuration is copied from a template printer to a target printer via the users' web browser by accessing an embedded webserver of the template printer and receiving a configuration form to post to the address of the target printer. Applicant therefore respectfully submits that Hawes fails to teach or suggest an imaging device adapted to store a configuration for the imaging device on a computer-usable media, where the configuration is input by commands received across a network by a management facility on the imaging device that is accessible through an embedded webserver, wherein the imaging device is adapted to store a list of other imaging devices on the network on the computer-usable media, and wherein the imaging device is adapted to transmit the configuration to a network address of at least one of

the other imaging devices of the stored list.. *See*, Hawes, Abstract and Summary; Figures 4 and 5; and Column 8, line 18 to Column 9, line 29. Applicant therefore respectfully submits that combining the elements of Schlonski et al. and Carcerano et al. with Hawes fails to teach or suggest all elements of independent claim 1, either alone or in combination and thus also fails to teach or suggest all elements of claims 5-6 and 9-10 that depend from and further define independent claim 1.

Applicant respectfully contends that claim 1 as pending has been shown to be patentably distinct from the cited references, either alone or in combination. As claims 5-6 and 9-10 depend from and further define claim 1 they are also considered to be in condition for allowance. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection under 35 U.S.C. § 103(a) and allowance of claims 5-6 and 9-10.

Claims 17-18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Schlonski et al.(U.S. Publication No. US 2002/0196451 A1) in view of Hawes (U.S. Patent No. 6,026,436). Applicant respectfully traverses this rejection and submits that claims 17-18 are allowable for the following reasons.

Applicant respectfully maintains, as stated above, that Schlonski et al. fails to teach or suggest all elements of claim 15, from which claims 17-18 depend. In addition, as stated above, Applicant respectfully maintains that Hawes discloses a system where a configuration is copied from a template printer to a target printer via the users' web browser by accessing an embedded webserver of the template printer and receiving a configuration form to post to the address of the target printer. Applicant therefore respectfully submits that combining the elements of Schlonski et al. with Hawes fails to teach or suggest all elements of independent claim 15, either alone or in combination and thus also fails to teach or suggest all elements of claims 17-18 that depend from and further define independent claim 15.

Applicant respectfully contends that claim 15 as pending has been shown to be patentably distinct from the cited references, either alone or in combination. As claims 17-18 depend from and further define claim 15 they are also considered to be in condition for allowance. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection under 35 U.S.C. § 103(a) and allowance of claims 17-18.

Claim 14 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Schlonski et al.(U.S. Publication No. US 2002/0196451 A1) in view of Mixer, Jr.(U.S. Patent No.

6,693,722 B1). Applicant respectfully traverses this rejection and submits that claim 14 is allowable for the following reasons.

Applicant respectfully maintains, as stated above, that Schlonski et al. fails to teach or suggest all elements of claim 11, from which claim 14 depends. In addition, Applicant respectfully maintains that Mixer, Jr. discloses an automatic configuration update system to update printer configuration changes to the communicating device/network interface. Applicant therefore respectfully submits that Mixer, Jr. fails to teach or suggest a system that communicates a configuration change across a network to a management facility that is accessible through a network interface and an embedded webserver of a first imaging device, selects at least one other imaging device from a list of other imaging devices stored on the first imaging device and communicates the configuration change from the imaging device to the at least one other imaging device selected from the list of other imaging devices stored on the first imaging device. *See*, Mixer, Jr., Abstract; Figures 1 and 2; and Column 1, line 25 to Column 2, line 53. Applicant therefore respectfully submits that combining the elements of Schlonski et al. with Mixer, Jr. fails to teach or suggest all elements of independent claim 11, either alone or in combination and thus also fails to teach or suggest all elements of claim 14 that depends from and further define independent claim 11.

Applicant respectfully contends that claim 11 as pending has been shown to be patentably distinct from the cited references, either alone or in combination. As claim 14 depends from and further defines claim 11 it is also considered to be in condition for allowance. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection under 35 U.S.C. § 103(a) and allowance of claim 14.

### CONCLUSION

If the Examiner has any questions or concerns regarding this application, please contact the undersigned at (612) 312-2207.

Respectfully submitted,

Date: \_\_\_\_\_

10/28/05



Andrew C. Walseth  
Reg. No. 43,234

Attorneys for Applicant

**REPLY UNDER 37 CFR 1.116 –**

**EXPEDITED PROCEDURE – TECHNOLOGY CENTER 2100**

**PAGE 14**

Serial No. 09/990,005

Attorney Docket No. 10008080-1

Title: IMAGING DEVICE CONFIGURATION AND UPGRADE

---

**HEWLETT-PACKARD COMPANY**

Intellectual Property Administration

P.O. Box 272400

Fort Collins, CO 80527-2400